

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**CURLING PLAINTIFFS' NOTICE OF FILING AN UPDATED
CALCULATION OF THEIR REQUEST FOR FEES AND COSTS**

Pursuant to this Court's June 29, 2023 directive, Curling Plaintiffs submit this updated calculation of Morrison & Foerster LLP's request for attorneys' fees and costs.

In addition to already removing entire time entries that referenced appellate work (or involved Morrison & Foerster LLP's appellate team even when they were supporting the District Court litigation) and the corresponding fees for those entries, Morrison & Foerster LLP also now removes (i) all expenses relating to any appellate work or incurred by its appellate team (\$23,125.22) and (ii) certain hotel stays (\$6,460.71) given the State's objections to certain of those costs. Morrison & Foerster LLP maintains that all these fees and costs are properly owed to Curling

Plaintiffs as prevailing parties but have removed them to narrow the disputes before the Court regarding this request.

Curling Plaintiffs' reduced request for attorneys' fees and expenses through its pending Motion is as follows:

Curling Plaintiffs' REVISED Fee Request: \$3,115,313.75

Curling Plaintiffs' REVISED Expense Request: \$407,795.63

Curling Plaintiffs' REVISED Overall Request: \$3,523,109.38

Respectfully submitted this 30th day of June, 2023.

/s/ David D. Cross

David D. Cross (*pro hac vice*)

Mary G. Kaiser (*pro hac vice*)

Caroline Middleton (*pro hac vice*)

Sonja N. Swanbeck (*pro hac vice*)

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/s/ Halsey G. Knapp, Jr.

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CERTIFICATE OF COMPLIANCE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2023, a copy of the foregoing **CURLING PLAINTIFFS' NOTICE OF FILING AN UPDATED CALCULATION OF THEIR REQUEST FOR FEES AND COSTS** was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross
David D. Cross